

PORSF  
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City views on CDFs  
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to:  
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04/15/2010 12:58 PM  
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The LWG recently sent correspondence concerning EPA's guidance on the analysis of Combined Disposal Facilities in Portland Harbor. I am writing to indicate the City's views on the subject. We believe CDFs merit careful evaluation in the course of the RI/FS. In particular, we encourage the consideration of various alternatives, including those that could provide high levels of containment and protection. With this kind of analysis, we believe CDFs can be fairly and fully evaluated by the agencies, relevant parties and the public as Portland Harbor decisions are made in the future. We believe it is essential to include in these analyses the relative costs, at least at a general level, and ranges of expected containment and protectiveness.

Since there appears to be some unresolved controversy at this stage, we believe these issues may benefit from further discussion and we support a time extension if needed to further consider these matters. However, the City does not intend to pursue dispute resolution on these issues at this time. We would prefer to have the chance to review a solid analysis of a broad range of CDF alternatives to help facilitate future discussions of their pros and cons. We would also like to explore further whether there is any useful distinction to made between the performance levels of CDFs versus caps that may be envisioned as part of the cleanup remedy.

Feel free to contact me with any questions you have on this important issue. See you soon.

